

EXHIBIT B

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June 10, 2020

Via Email

Finkelstein Law Group, PLLC
Attn: Stuart Finkelstein
338 Jericho Turnpike
Syosset, New York 11791

Re: *Antolini v. McCloskey et al*
Case No.: 1:19-cv-09038-GBD

Dear Mr. Finkelstein:

This law firm represents Defendants Dimur Enterprises Inc., Amy McCloskey and Theresa Laurent (collectively, the “**Defendants**”) in the above-referenced action.

We are in receipt of Plaintiff’s Rule 26(a) Initial Disclosures (“**Plaintiff’s Initial Disclosures**”), dated May 30, 2020. We write with respect to deficiencies in Plaintiff’s Initial Disclosures.

Plaintiff’s Initial Disclosures are incomplete and incorrect for failure to properly disclose a computation of each category of damages claimed. Plaintiff’s Initial Disclosures also failed to disclose the documents on which each computation is based. *See* Fed. R. Civ. Pro. 26(a)(1)(A)(iii) and (e).

This letter respectfully serves as our attempt under Local Civil Rule 37.3 to meet and confer in an effort to achieve an informal resolution of discovery disputes prior to requiring judicial intervention through a motion to compel further response.

We request you to please send your revised Rule 16(a) Initial Disclosures on or before June 19, 2020 in order avoid further Court intervention.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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